

WOMBLE
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A PROFESSIONAL LIMITED
LIABILITY COMPANY

1401 Eye Street, NW
Seventh Floor
Washington, DC 20005

Telephone: (202) 467-6900
Fax: (202) 467-6910
www.wcsr.com

Jennifer M. Kashatus
Attorney
Direct Dial: (202) 857-4506
Direct Fax: (202) 261-0006
E-mail: JKashatus@wcsr.com

February 27, 2009

VIA ECFS

Marlene Dortch, Secretary
Federal Communications Commission
445 12th Street, SW
Washington, D.C. 20554

Re: EB Docket No. 06-36

Dear Ms. Dortch:

Corporate Satellite Communications of Florida, Inc. ("CSC Florida"), through its undersigned counsel, respectfully submits its Customer Proprietary Network Information ("CPNI") certification per section 64.2009(e) of the Commission's rules, 47 C.F.R. § 64.2009(e).

CSC Florida does not provide services on a common carrier basis, and, therefore, is not required to submit a CPNI certification. The Commission's CPNI rules apply to providers of telecommunications services and interconnected VoIP services. *See* 47 C.F.R. § 64.2001 *et seq.* The Commission has held that the term "telecommunications services" encompasses only those services provided on a common carrier basis.¹ CSC Florida exclusively provides uplink and downlink satellite services on a non-common carrier basis to three customers. CSC Florida does not offer its services to the public. Moreover, given the nature of CSC Florida's services, CSC Florida did not maintain any call detail record information in 2008, per se, or very little, if any, information that otherwise would be deemed to fall within the definition of CPNI.

CSC Florida values the privacy of its customers, and has implemented procedures to safeguard consumer privacy. Therefore, and out of an abundance of caution, CSC Florida is submitting the enclosed CPNI certification, which describes the policies and procedures that CSC Florida has in place to safeguard the limited customer information that it maintains.

¹ *Federal-State Joint Board on Universal Service, Report and Order*, 12 FCC Rcd 8776, 9177-78, ¶ 785 (1996).

Please contact me at (202) 857-4506 if you have any questions regarding this.
filing.

Respectfully submitted,



Jennifer M. Kashatus

Encl.

Annual 47 C.F.R. § 64.2009 CPNI Certification

EB Docket No. 06-36

Annual 64.2009(e) CPNI Certification for 2008

Date filed: February 27, 2009

Names of Company covered by this certification: Corporate Satellite Communications of Florida, Inc.

Filer ID: 820067

Name of Signatory: Kathleen McGovern

Title of Signatory: Executive Vice President

I, Kathleen McGovern, certify that I am an officer of Corporate Satellite Communications of Florida, Inc. ("CSC Florida"), and, acting as an agent of CSC Florida, that I have personal knowledge that the company has operating procedures and policies in place that are designed to ensure compliance with the Federal Communication Commission's ("Commission") CPNI rules. *See* 47 C.F.R. § 64.2001 *et seq.*

Attached to this certification is an accompanying statement explaining how the company's procedures are designed to maintain compliance with the Commission's CPNI rules.

CSC Florida did not take any actions (proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission) against data brokers during the 2008 calendar year. CSC Florida did not receive any complaints during the 2008 calendar year concerning the unauthorized release of CPNI.

CSC Florida has not discovered any information about the processes that pretexters are using to attempt to gain access to CPNI other than the publicly disclosed information in this docket. CSC Florida has instituted procedures to safeguard customer information, which are referenced in part in the attached statement.

By:

Kathleen McGovern

Date:

2/27/09

CORPORATE SATELLITE COMMUNICATIONS OF FLORIDA

STATEMENT OF CPNI OPERATING PROCEDURES

Corporate Satellite Communications of Florida ("CSC Florida") provides this statement pursuant to section 64.2009(e) of the Federal Communications Commission's ("Commission") rules, 47 C.F.R. § 64.2009(e), to summarize the operational procedures and policies in place that are designed to ensure compliance with the Commission's Customary Proprietary Network Information ("CPNI") rules.

CSC Florida exclusively provides uplink and downlink satellite services on a non-common carrier basis to a small number of customers. CSC Florida does not offer its services to the public.

Protecting Customer Information Including CPNI: CSC Florida values the confidentiality of its customers' information, including, but not limited to CPNI (to the extent that any of the information it maintains is CPNI). CSC Florida has confidentiality provisions in each of its customer contracts to protect customer information. Due to the nature of its services, very little, if any, of the information CSC Florida maintains constitutes CPNI, and CSC Florida does not have any information that constitutes call detail information.

CSC Florida authenticates its customers during in-bound calls. CSC Florida directs its employees to discover activity that is indicative of pretexting and to take measures to protect against pretexting, such as call authentication. CSC Florida will notify the Commission if it learns of any efforts that pretexters are using to attempt to gain access to CPNI. CSC Florida will track customer complaints involving the use of CPNI.

Use of CPNI: As a general matter, CSC Florida does not use, disclose, or permit access to its customers' information, including CPNI. CSC Florida, however, may use CPNI for the permissible purposes set forth in section 222 of the Communications Act of 1934, as amended, including, but not limited to, for the limited purposes for rendering, initiating, providing, billing and collecting for the services from which the CPNI is derived; to protect its property rights, or to protect its customers and other carriers from fraudulent, abusive, or unlawful use of or subscription to, its services; and as required by law.

CSC Florida does not use CPNI for marketing purposes.

Employee Training: CSC Florida trains its personnel regarding the confidentiality of customer information, including what information is classified as CPNI and when its employees are authorized and are not authorized to use such information. CSC Florida has a disciplinary process in place for the misuse of confidential information.

Data Security Breaches: CSC Florida will notify law enforcement and its customers, as permitted and required by law, if it learns that any of its customer information has been compromised. CSC Florida will maintain a record of the incident and such notification in accordance with section 64.2011(d) of the Commission's rules.